

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
WACO DIVISION**

<b>WSOU INVESTMENTS, LLC D/B/A</b>	<b>§</b>	
<b>BRAZOS LICENSING AND</b>	<b>§</b>	<b>CIVIL ACTION 6:20-cv-01163-ADA</b>
<b>DEVELOPMENT,</b>	<b>§</b>	<b>CIVIL ACTION 6:20-cv-01164-ADA</b>
<i>Plaintiff,</i>	<b>§</b>	<b>CIVIL ACTION 6:20-cv-01165-ADA</b>
<b>v.</b>	<b>§</b>	<b>CIVIL ACTION 6:20-cv-01166-ADA</b>
<b>SALESFORCE.COM, INC.,</b>	<b>§</b>	<b>CIVIL ACTION 6:20-cv-01167-ADA</b>
<i>Defendant.</i>	<b>§</b>	<b>CIVIL ACTION 6:20-cv-01168-ADA</b>
	<b>§</b>	<b>CIVIL ACTION 6:20-cv-01169-ADA</b>
	<b>§</b>	<b>CIVIL ACTION 6:20-cv-01170-ADA</b>
	<b>§</b>	<b>CIVIL ACTION 6:20-cv-01171-ADA</b>
	<b>§</b>	<b>CIVIL ACTION 6:20-cv-01172-ADA</b>

**DECLARATION OF SAM STAKE IN SUPPORT OF  
SALESFORCE.COM, INC.'S CLAIM CONSTRUCTION BRIEF**

I, Sam Stake, declare as follows:

1. I am a partner at Quinn Emanuel Urquhart & Sullivan LLP. If called as a witness, I could and would testify competently to the information contained herein.
2. Attached hereto as Exhibit A is the Declaration of Dr. Douglas C. Schmidt in Support of Salesforce's Opening Claim Construction Brief, dated October 6, 2021.

**A. The '819 patent**

3. Attached hereto as Ex. 819-1 is a true and correct copy of U.S. Patent No. 8,335,819.
4. Attached hereto as Ex. 819-2 is a true and correct excerpt of Webster's New World Telecom Dictionary (2008) ("Scripting"), produced in this action as SFDC00019283 - SFDC00019285.
5. Attached hereto as Ex. 819-3 is a true and correct excerpt of Encyclopedia of Computer Science and Technology, Revised Edition (2009) ("Scripting Languages"), produced in this action as SFDC00019276 - SFDC00019279.

**B. The '827 patent**

6. Attached hereto as Ex. 827-1 is a true and correct copy of U.S. Patent No. 8,369,827.
7. Attached hereto as Ex. 827-2 is a true and correct excerpt of 3GPP TS 23.203 V9.3.0, produced in this action as SFDC00019289 - SFDC00019339.
8. Attached hereto as Ex. 827-3 is a true and correct copy of Chapter 10 of EPC and 4G Packet Networks: Driving Mobile Broadband Revolution (2d ed.) (2013), produced in this action as SFDC00020445 - SFDC00020455.
9. Attached hereto as Ex. 827-4 is a true and correct excerpt of 3GPP TS 29.212

V8.3.0, produced in this action as SFDC00020213 - SFDC00020238.

10. Attached hereto as Ex. 827-5 is a true and correct excerpt of 3GPP TS 23.002 V9.1.0, produced in this action as SFDC00020121 - SFDC00020163.

11. Attached hereto as Ex. 827-6 is a true and correct copy of Policy and Charging Rules Function (PCRF) in LTE EPC Core Technology by Mojtaba Houshmand, produced in this action as SFDC00020458 - SFDC00020484.

**C. The '928 patent**

12. Attached hereto as Ex. 928-1 is a true and correct copy of U.S. Patent No. 8,280,928 (the “'928 patent”).

13. Attached hereto as Ex. 928-2 is a true and correct excerpt of Dictionary of Computer and Internet Terms (10th ed.) (2009) (“Directory”), produced in this action as SFDC00020111 - SFDC00020114.

14. Attached hereto as Ex. 928-3 is a true and correct excerpt of The Facts on File Dictionary of Computer Science, Revised Edition (2006) (“Directory”), produced in this action as SFDC00020115 - SFDC00020117.

15. Attached hereto as Ex. 928-4 is a true and correct excerpt of the November 23, 2011 Applicant Amendment in the File History of the '928 patent.

16. Attached hereto as Ex. 928-5 is a true and correct excerpt of the January 11, 2012 Final Rejection in the File History of the '928 patent.

17. Attached hereto as Ex. 928-6 is a true and correct excerpt of the March 14, 2012 Appeal Brief in the File History of the '928 patent.

**D. The '493 patent**

18. Attached hereto as Ex. 493-1 is a true and correct copy of U.S. Patent No.

9,088,493.

19. Attached hereto as Ex. 493-2 is a true and correct excerpt of A Dictionary of Computer Science (7th ed.) (2016) (“Login”), produced in this action as SFDC00019084 - SFDC00019086.

20. Attached hereto as Ex. 493-3 is a true and correct excerpt of Webster’s New World College Dictionary (5th ed.) (2014) (“Consistent”), produced in this action as SFDC00020500 - SFDC00020507.

21. Attached hereto as Ex. 493-4 is a true and correct excerpt of Collins English Dictionary (1st ed.) (2015) (“Consistent”), produced in this action as SFDC00020487 - SFDC00020489.

**E. The ’411 patent**

22. Attached hereto as Ex. 411-1 is a true and correct copy of U.S. Patent No. 8,209,411 (the “’411 patent”).

23. Attached hereto as Ex. 411-2 is a true and correct excerpt of The Digital Designer’s Jargon Buster (1st ed.) (2004) (“Gateway”), produced in this action as SFDC00019075 - SFDC00019077.

24. Attached hereto as Ex. 411-3 is a true and correct excerpt of Microsoft Computer Dictionary (5th ed.) (2002) (“Gateway”), produced in this action as SFDC00019078 - SFDC00019080.

25. Attached hereto as Ex. 411-4 is a true and correct except of the April 20, 2011 Office Action in the File History of ’411 patent.

26. Attached hereto as Ex. 411-5 is a true and correct July 20, 2011 Applicant Remarks in Response to Office Action in the File History of ’411 patent.

**F. The '060 patent**

27. Attached hereto as Ex. 060-1 is a true and correct copy of U.S. Patent No. 9,277,060 (the “'060 patent”).

28. Attached hereto as Ex. 060-2 is a true and correct excerpt of Newton’s Telecom Dictionary (2005) (“Event”), produced in this action as SFDC00019044 - SFDC00019046.

29. Attached hereto as Ex. 060-3 is a true and correct excerpt of Dictionary of Computing (5th ed.) (2004) (“Log”), produced in this action as SFDC00019041 - SFDC00019043.

30. Attached hereto as Ex. 060-4 is a true and correct excerpt of Dictionary of Computer Science (Revised Edition) (2006) (“Log”), produced in this action as SFDC00019034 - SFDC00019037.

31. Attached hereto as Ex. 060-5 is a true and correct excerpt of Wiley Electrical and Electronics Engineering Dictionary (2004) (“Log”), produced in this action as SFDC00019053 - SFDC00019055.

32. Attached hereto as Ex. 060-6 is a true and correct excerpt of the December 20, 2010 Amendment in Response to Final Office Action in the File History of the '060 patent.

**G. The '731 patent**

33. Attached hereto as Ex. 731-1 is a true and correct copy of U.S. Patent No. 7,551,731 (the “'731 patent”).

34. Attached hereto as Ex. 731-2 is a true and correct excerpt of Hargrave’s Comm’ns Dictionary (2001) (“Called Party,” “Calling Party,” “Caller ID (CLID),” and “Caller Device”), produced in this action as SFDC00019099 - SFDC00019102.

35. Attached hereto as Ex. 731-3 is a true and correct excerpt of Hargrave’s Comm’ns Dictionary (2001) (“Terminal Equipment”), produced in this action as SFDC00019103 -

SFDC00019105.

36. Attached hereto as Ex. 731-4 is a true and correct excerpt of Newton's Telecom Dictionary (19th Ed.) (2003) ("Calling Party" and "Caller Name"), produced in this action as SFDC00019106 - SFDC00019108.

37. Attached hereto as Ex. 731-5 is a true and correct excerpt of the October 22, 2008 Final Rejection in the File History of the '731 patent.

38. Attached hereto as Ex. 731-6 is a true and correct excerpt of the December 12, 2008 Response to Office Action in the File History of the '731 patent.

39. Attached hereto as Ex. 731-7 is a true and correct excerpt of the January 22, 2009 Response to Final Office Action in the File History of the '731 patent.

40. Attached hereto as Ex. 731-8 is a true and correct excerpt of the February 11, 2009 Notice of Allowance in the File History of the '731 patent.

#### **H. The '892 patent**

41. Attached hereto as Ex. 892-1 is a true and correct copy of U.S. Patent No. 8,391,892 (the "'892 patent").

42. Attached hereto as Ex. 892-2 is a true and correct excerpt of the February 12, 2009 Applicant Arguments/Remarks Made in Amendment in the File History of the '892 patent.

#### **I. The '320 patent**

43. Attached hereto as Ex. 320-1 is a true and correct copy of U.S. Patent No. 9,336,320 (the "'320 patent").

44. Attached hereto as Ex. 320-2 is a true and correct excerpt of Dictionary of Computing (5th ed.) (2004) ("Ghost"), produced in this action as SFDC00019056 - SFDC00019058.

45. Attached hereto as Ex. 320-3 is a true and correct excerpt of Dictionary of Computing (6th ed.) (2010) (“Ghost”), produced in this action as SFDC00019059 - SFDC00019061.

46. Attached hereto as Ex. 320-4 is a true and correct excerpt of the February 19, 2010 Original Application in the File History of the ’320 patent.

47. Attached hereto as Ex. 320-5 is a true and correct excerpt of the January 14, 2013 Amendment in the File History of the ’320 patent.

48. Attached hereto as Ex. 320-6 is a true and correct excerpt of the January 25, 2013 Response to Office Action in the File History of the ’320 patent.

49. Attached hereto as Ex. 320-7 is a true and correct excerpt of the March 25, 2013 Response to Office Action in the File History of the ’320 patent.

50. Attached hereto as Ex. 320-8 is a true and correct excerpt of the June 11, 2013 Larson Appeal Brief in the File History of the ’320 patent.

51. Attached hereto as Ex. 320-9 is a true and correct excerpt of the October 28, 2015 Appeal Decision in the File History of the ’320 patent.

**J. The ’899 patent**

52. Attached hereto as Ex. 899-1 is a true and correct copy of U.S. Patent No. 8,923,899 (the “’899 patent”).

53. Attached hereto as Ex. 899-2 is a true and correct excerpt of Webster’s New World Telecom Dictionary (“SIP (Session Initiation Protocol)”), produced in this action as SFDC00020108 - SFDC00020110.

54. Attached hereto as Ex. 899-3 is a true and correct copy of RFC 3261 for SIP: Session Initiation Protocol, produced in this action as SFDC00019839 - SFDC00020107.

55. Attached hereto as Ex. 899-4 is a true and correct excerpt of the April 25, 2013 Response to Office Action in the File History of the '899 patent.

56. Attached hereto as Ex. 899-5 is a true and correct copy of Roy Thomas Fielding's Dissertation *Architectural Styles and the Design of Network-based Software Architectures* (2000), produced in this action as SFDC00019659 - SFDC00019838.

I declare under penalty of perjury that the foregoing is true and correct. Executed on October 6, 2021.

/s/ Sam Stake  
Sam Stake